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BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF HAWAII

- - - - In the Matter of - - - -)	Docket No. 03-0372
)	
)	
PUBLIC UTILITIES COMMISSION)	
)	
)	
Instituting a Proceeding to Investigate)	
Competitive Bidding for New Generating)	
Capacity In Hawaii)	

I. INTRODUCTION

The Hawaii Renewable Energy Alliance ("Movant") hereby moves the Hawaii Public Utilities Commission ("Commission") for an order allowing Movant to intervene as a party in this Docket for Instituting a Proceeding to Investigate Competitive Bidding for New Generating Capacity in Hawaii.

II. MOTION TO INTERVENE OF THE HAWAII RENEWABLE ENERGY ALLIANCE

BACKGROUND

The Hawaii Renewable Energy Alliance (HREA) is a Hawaii-based, private, non-profit corporation, exempt from federal income tax under Section 501(c)(6) of the Internal Revenue Code of 1986, composed of developers, manufacturers, distributors, scientists, engineers, and advocates in renewable energy. Individual HREA members were intervenors in PUC Docket No. 94-0226 (Renewable Energy) and in the first two rounds of HECO's IRP, including the Externalities Working Group, Supply-Side and DSM Advisory Committees. HREA was an intervenor in PUC Docket No. 96-0493 (Electric Competition, Including an investigation of the Electric Utility Infrastructure in the State of Hawaii). HREA is a current intervenor in PUC Docket No. 99-0004 (MECO

IRP – 2000 to 2020). Accordingly, the HREA has a substantial and continuing interest in the subject of renewable energy in the electric utility sector. Furthermore, since the renewable energy facilities, such as windfarms, concentrating solar power and photovoltaics, biomass cogeneration, combustion and gasification, and hydropower, may be considered for new generating capacity in Hawaii, HREA has a substantial and continuing interest in the subject of this docket.

ARGUMENT

Pursuant to Hawaii Revised Statutes Section 269-6 and Sections 6-61-41 and 6-61-55, Rules of Practice and Procedure before the Public Utilities Commission, Chapter 61, of Title 6 of the Hawaii Administrative Rules, Movant states the following in support of its motion:

1. Nature of Movant's Statutory or other Right to Participate in this Proceeding.

By opening this Docket, the Commission has invited all interested electric service providers, organizations, business groups and community groups to participate in this docket as intervenors or participants.

Petitioner is an “organization” within the meaning of the invitation.

2. The Nature and Extent of the Applicant's Property, Financial, and Other Interest in the Pending Matter.

Member organizations and individuals are owners, employees, consultants or agents involved in and/or considering renewable energy facilities in Hawaii. Given that one or more of these member organizations or individuals may wish to participate in a competitive bidding process for new generating capacity, there are substantial financial and other interests implicated in this docket.

3. Effect of Pending Order upon Movant's Interest.

See #2 above.

4. Other Means by Which the Movant's Interest may be Protected.

None

5. Extent to Which Movant's Interest will be Represented by Other Parties.

None. For example, the utilities and the Consumer Advocate cannot adequately represent the interests of HREA and its individual members.

6. Extent to Which Movant Can Assist in the Development of a Sound Evidentiary Record.

The resources, expertise and time necessary for individual members to effectively participate in this process require effective and professional coordinated representation. The HREA will provide such representation for its members.

7. Extent to Which Movant's Participation will Broaden the Issues or Delay the Proceeding

None

8. Extent to Which Movant's Interest from the General Public

See #2 above.

9. Whether the applicant's position is in support of or in opposition to the relief sought

HREA supports competitive bidding for new generating capacity. HREA supports inclusion of all sources, including renewable energy facilities, in the process. HREA believes that a fair competitive bidding process will help foster increased wholesale competition for electric power sources. HREA believes further that a number

of benefits will result from increased competition, including innovation in proposals for meeting new generating capacity needs, lower wholesale energy costs to the utility, and more choices and possibly lower electricity prices to the electric consumer.

CONCLUSION

Based on the foregoing, Movant respectfully requests the Commission to grant Movant's Motion to Intervene.

DATED: November 6, 2003, Honolulu, Hawaii

A handwritten signature in cursive script, appearing to read "David A. Bellm", is written over a horizontal line.

CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing Motion to Intervene upon the following parties by causing a copy hereof to be hand-delivered or mailed, postage prepaid, and properly addressed the number of copies noted below to each such party:

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